

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

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November 5, 2004

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T.R.A. DOCKET ROOM

Re: BellSouth's Motion for the Establishment of )  
New Performance Assurance Plan ) Docket No. 04-00150  
)

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PETITION TO INTERVENE OF COMPSOUTH

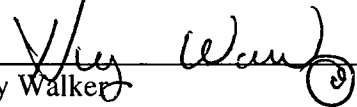
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Competitive Carriers of the South, Inc. ("CompSouth")<sup>1</sup> petitions the Authority to intervene in the above-captioned proceeding pursuant to T.C.A. § 4-5-310(a).

CompSouth is a coalition of competitive local exchange carriers certified by the Tennessee Regulatory Authority ("TRA"). This proceeding will address, among other things, the terms and conditions under which CompSouth members may operate in Tennessee. Specifically, this proceeding will address performance measures and penalties regarding the wholesale provision of services and network elements to CompSouth members. Therefore, the legal rights, duties, privileges, immunities, or other legal interests of CompSouth's members may be affected or determined by the outcome of this proceeding. Granting this petition will not impair the interests of justice or the orderly and prompt conduct of these proceedings.

CompSouth, therefore, asks that this Petition to Intervene be granted.

Respectfully submitted,

By:   
Henry Walker  
Boult, Cummings, Conners & Berry, PLC  
414 Union Street, Suite 1600  
P. O. Box 198062  
Nashville, Tennessee 37219  
(615) 252-2363

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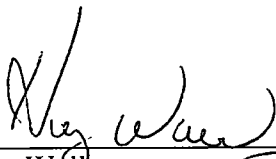
<sup>1</sup> The members of CompSouth include Access Integrated Networks, Inc., Access Point Inc., MCI, Birch Telecom, Covad Communications Company, AT&T, Talk America, Nuvox Communications, Inc., ITC^DeltaCom, Xspedius Communications, Momentum Telecom, Inc., Network Telephone Corp., KMC Telecom, LecStar Telecom, Inc., Z-Tel Communications, Inc., InLine and IDS Telecom LLC

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded electronically and via U.S. Mail, postage prepaid, to:

Guy M. Hicks  
BellSouth Telecommunications, Inc.  
333 Commerce Street  
Suite 2101  
Nashville, TN 37201-3300

on this the 8<sup>th</sup> day of November, 2004.

  
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Henry Walker